Section 1. Registration Information

Source Identification

Facility Name:	Mexichem Specialty Resins, Inc.
Parent Company #1 Name:	Mexichem Specialty Resins, Inc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	10-Jul-2018
Postmark Date:	10-Jul-2018
Next Due Date:	10-Jul-2023
Completeness Check Date:	10-Jul-2018
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0013 1957
Other EPA Systems Facility ID:	08067THGNCUSRTE
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	801040023
Parent Company #1 DUNS:	0
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	Route 130 & Porcupine Road
Street 2:	76 Porcupine Rd.
City:	Pedricktown
State:	NEW JERSEY
ZIP:	08067
ZIP4:	0400
County:	SALEM

Facility Latitude and Longitude

Latitude (decimal):	39.764639
Longitude (decimal):	-075.423278
Lat/Long Method:	Interpolation - Map
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	Mexichem Specialty Resins, Inc.
Operator Phone:	(856) 299-5400

Mailing Address

Operator Street 1:	PO Box 420
Operator Street 2:	76 Porcupine Road
Operator City:	Pedricktown
Operator State:	NEW JERSEY
Operator ZIP:	08067
Operator ZIP4:	0400
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Otis J. Sistrunk
RMP Title of Person or Position:	Safety/Environmental Manager
RMP E-mail Address:	otis.sistrunk@mexichem.com

Emergency Contact

Emergency Contact Name:	Otis J. Sistrunk
Emergency Contact Title:	Safety/Environmental Manager
Emergency Contact Phone:	(856) 299-8413
Emergency Contact 24-Hour Phone:	(856) 299-5400
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	otis.sistrunk@mexichem.com

Other Points of Contact

Facility or Parent Company E-mail Address:	otis.sistrunk@mexichem.com
Facility Public Contact Phone:	(856) 299-5400
Facility or Parent Company WWW Homepage Address:	www.mexichem.com

Local Emergency Planning Committee

LEPC:	Oldmans Township OEM

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	79
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes

Air Operating Permit ID:	65494

OSHA Ranking

OSHA Star or Merit Ranking:	

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	18-Jan-2018
Last Safety Inspection Performed By an External Agency:	State occupational safety agency

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	
Preparer Phone:	
Preparer Street 1:	
Preparer Street 2:	
Preparer City:	
Preparer State:	
Preparer ZIP:	
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000088957
Description:	Disp. PVC Polymerization
Process Chemical ID:	1000111305
Program Level:	Program Level 3 process
Chemical Name:	Vinyl chloride [Ethene, chloro-]
CAS Number:	75-01-4
Quantity (lbs):	140000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000088957
Process NAICS ID:	1000090179
Program Level:	Program Level 3 process
NAICS Code:	325211
NAICS Description:	Plastics Material and Resin Manufacturing

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000052463

Model Used:	EPA's OCA Guidance Reference Tables or Equations
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	See Executive Summary for mitigation measures.

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000049677

Model Used:	EPA's OCA Guidance Reference Tables or Equations

Passive Mitigation Considered

Dikes:	
Fire Walls:	
Blast Walls:	
Enclosures:	
Other Type:	See Executive Summary for mitigation measures.

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Excess Flow Valve:	
Other Type:	See Executive Summary for mitigation measures.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

Mexichem Specialty Resin¿s has in place a Risk Management Program for Vinyl Chloride encompassing prevention elements consistent with the New Jersey Toxic Catastrophe Prevention Act, the New Jersey Spill Compensation and Control Act, the Occupational Safety and Health Administration (OSHA) Process Safety Management Standard for Highly Hazardous Chemicals, the OSHA Vinyl Chloride Standard and the USEPA National Emission Standard for hazardous Air pollutants. Mexichem Specialty Resin¿s has implemented the following prevention elements as part of these programs: 1. An Employee Participation policy to regularly consult with employees regarding the development and implementation of prevention program elements and hazard assessments. 2. A comprehensive Process Safety Information program which ensures complete and accurate written information concerning process chemicals, process technology and process equipment. This information is included in the employee training programs. 3. A Process Hazard Analysis is conducted to identify and analyze the potential hazards associated with the processing or handling of highly hazardous chemicals. 4. An Electrical Classification system to ensure properly designed electrical distribution systems in all chemical process areas. 5. The preparation of written Operating Procedures which describe tasks to be performed, operating conditions to be maintained, data to be recorded, and safety precautions to be taken to ensure safe operation of equipment. 6. Employee Training programs to ensure that all employees involved with chemicals, fully understand the requirements to safely operate each chemical process. Mexichem Specialty Resin¿s has an "Operator Certification" program in place to train, test and certify all company employees who operate a chemical process. 7. A Contractor program to ensure that they have the appropriate job skills, knowledge and certifications to perform the job safely. 8. For new or modified processes, a Pre-Startup Safety review is conducted to ensure a safe transition into the normal operating mode. 9. A Mechancial Integrity / Preventive Maintenance program designed to continually review and ensure the integrity of all critical operating process equipment, process support utilities and instrumentation. Â¿ Identification and categorization of equipment and instrumentation Â¿ Inspections and tests Â¿ Establishment of prescribed inspection frequencies Â¿ Development and application of pertinent maintenance procedures Â¿ Training of maintenance personnel Â¿ Documentation of test and inspection results Â¿ Documentation of manufacturer's maintenance recommendations 10. A Hot Work Permit system to manage welding, cutting, brazing or spark producing operations in process areas. 11. A Management of Change system to manage changes involving processes, chemicals, technology, equipment or facilities. 12. An Incident Investigation of a chemical release or "near miss" is conducted by a team of experienced individuals familiar with the process. Recommendations are communicated and implemented as appropriate. 13. A facility Emergency Response program is in place in the event of a chemical release. This program is drilled internally and with the community emergency response personnel on a regular basis. An all hazards Emergency Response program is also in place for the surrounding community and the county. This program is coordinated through the Salem County Office of Emergency Services. 14. Annual Compliance Audits are performed to review all relevant documentation, verify process safety information, inspect the physical facilities and conduct interviews with representative plant personnel.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000093634
Chemical Name:	Vinyl chloride [Ethene, chloro-]
Flammable/Toxic:	Flammable
CAS Number:	75-01-4

Process ID:	1000088957
Description:	Disp. PVC Polymerization
Prevention Program Level 3 ID:	1000075275
NAICS Code:	325211

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	01-Jul-2015

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	01-Jul-2015

The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	01-Jan-2017

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	Yes
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	Yes
Rupture Disks:	Yes
Excess Flow Device:	

Quench System:	
Purge System:	
None:	
Other Process Control in Use:	Vent or evacuation system to recover vapors

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	Yes
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	portable or fixed firewater monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Portable detectors are used for leak detection and during any incident.

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	Yes
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	22-Nov-2017

Training

Training Revision Date (The date of the most recent review or revision of training programs):	22-Nov-2017

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	01-Mar-2018
Equipment Inspection Date (The date of the most recent equipment inspection or test):	01-Apr-2018
Equipment Tested (Equipment most recently inspected or tested):	Integrity testing of TK - 3AA & 4AA

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	01-May-2018
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	01-Apr-2018

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	01-Jun-2018

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	29-Apr-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	01-Dec-2018

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	08-Oct-2015
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	01-Jan-2017

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	01-May-2018

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	01-Jun-2018

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Apr-2018
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	15-Jan-2018

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	01-Mar-2018

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	01-May-2018

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Salem County Office of Emergency Mg
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(856) 769-2900

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	OSHA 29 CFR 1910.1017; USEPA 40 CFR Part 61; NJSA 58:10-23.11; NJSA 13:1B-3

Executive Summary

MEXICHEM SPECIALTY RESIN, PEDRICKTOWN, NEW JERSEY FACILITY DESCRIPTION

Mexichem Specialty Resin is a leading North America based polymer technology and service company with operations in polyvinyl chloride compounds and other value-added products and services, as well as polyvinyl chloride resins. The Pedricktown facility manufactures speciality dispersion resins. Dispersion resins are used in a wide array of products including resilient vinyl flooring, vinyl gloves, toys, weather stripping, spray coating, can coatings, carpet backing, adhesives and adhesive bandage strips.

During the past few years, Mexichem Specialty Resin has proactively been discussing the most recent Risk Management Program regulatory requirements with community and county officials. This activity included educational sessions and tours with emergency response personnel, discussion of regulated materials and the prevention programs in place to prevent releases, emergency response capabilities and methods and considerations used to calculate worse-case and alternative release scenarios.

ACCIDENTIAL RELEASE PREVENTION & EMERGENCY RESPONSE POLICY

Mexichem Specialty Resin has a strong commitment to accidental release prevention and emergency response as stated in the Plant Manager's Safety and Health Message, Company Environmental Policy and Company Safety and Health Policy. Mexichem Specialty Resin has fulfilled this commitment through a long history of outstanding safety performance, including receipt of the New Jersey Governor's Award and numerous industry and company awards for safety and environmental excellence. Mexichem Specialty Resin has also provided long term leadership in emergency response preparedness for both the Pedricktown community and Salem County.

PLANT MANAGER'S SAFETY& HEALTH MESSAGE

The Safety and Health of all employees and visitors to the Pedricktown Plant is our first and foremost priority. Any job that cannot be done safely will not be done. All employees and visitors are encouraged to use all of the supplied safety procedures, training, and tools to prevent injuries both on and off the job. All employees and visitors have the "License to be safe" and are authorized to delay the start of any task or job until all of their safety concerns have been satisfied. With each of us personally responsible for our own safety and well-being, our plant will continue to be successful and viable in the future.

ENVIRONMENTAL POLICY

It is the policy of Mexichem Specialty Resin to conduct our operations in a manner fully protective of employees, customers, public health and the environment. Implementation of this policy shall be through programs which are proactive in nature and go beyond compliance with applicable laws and regulations. Mexichem Specialty Resin's commitment to the principles of Responsible Care provides clear guidance for action.

We will conduct ongoing evaluation of our operations and products to identify practical opportunities for continuing reduction of releases and wastes. We are committed to a continued reduction of emissions and permit exceedances, as well as, minimizing the generation of solid and hazardous waste.

Excellence in program leadership and stewardship is a key management responsibility. Insuring that all operations in the company are carried out in accordance with this Policy is the responsibility of each employee.

SAFETY & HEALTH POLICY

The policy of our company is to safeguard the health and well-being of each employee and our neighbors. Implementation of this policy shall be through the elimination of accidents and, by establishing through our activities, safety and health management among the highest corporate priorities. This policy applies to all employees and contractors to Mexichem Specialty Resin.

Ensuring the safety of all personnel is everyone's concern and requires a constant sense of awareness and attention to detail. The development of safety awareness can only come through each person's acceptance of his responsibility for safety in conjunction with adequate job orientation, training, recognition and communication of the hazards associated with each work situation.

Everyone must believe that all accidents are either preventable or avoidable.

Effective management of our process safety is critical in maintaining the integrity of our operations. All necessary equipment, tools, technologies, procedures, and training will be provided to assist everyone in operating our processes and performing their jobs safely. At Mexichem Specialty Resin, every job and operation must be managed safely.

Safety performance will be a key element of each employee's and contractor's performance evaluation. Excellence in safety performance is a condition of employment at Mexichem Specialty Resin.

The prevention of accidents while off the job is equally important. The same principles at work are also effective in preventing accidents in the home, on the highway and in all other activities.

Working and living safely must be our way of life.

REGULATED SUBSTANCES

Mexichem Specialty Resin is regulated under the OSHA Process Safety Management Standard and the New Jersey Department of Environmental Protection (NJDEP) Toxic Catastrophe Prevention Act (TCPA), which regulate the management of process safety. The OSHA Process Safety Management Standard regulation is designed to protect workers from catastrophic process incidents and the TCPA regulation is designed to protect the public and the environment. These existing programs exceed the new federal USEPA Risk Management Program requirements in many aspects and have been in place for several years.
Mexichem Specialty Resin has one regulated flammable substance, Vinyl Chloride CAS No. 75-01-4 and one regulated toxic substance, Ammonia (anhydrous) CAS No. 7664-41-7 regulated by OSHA and NJDEP. Vinyl Chloride is used to manufacture dispersion speciality resins. It is polymerized (reacted and converted) into polyvinyl chloride (PVC) which is an inert plastic. This conversion takes place in a closed computerized process using state of the art technology. The product is then dried, packaged and shipped to customers. Ammonia is used as a refrigerant to make chilled water. The chilled water is used to remove heat from the dispersion manufacturing process.

RELEASE SCENARIOS
The NJDEP and the USEPA accident prevention regulations require companies to analyze what is defined as a worse-case release scenario. Companies are also required to analyze an alternative release scenario.
The worse-case scenario is a hypothetical release of the largest quantity of any toxic material or flammable listed under the regulations as determined by USEPA. The USEPA mandates that companies presume the release of the entire quantity of the substance in ten (10) minutes. Mexichem Specialty Resin could not consider the numerous prevention and emergency response systems, procedures, equipment, controls, and trained employees that are in place as part of this scenario.
The alternative case scenario is a more credible scenario that is closer to a real world incident. Facilities are allowed to include active safety systems. Active safety systems include procedures and equipment which are used to contain or minimize the impact of an accidental release. Examples of active safety systems are detection systems, computer controlled valves, fire protection systems and employee actions.

WORST-CASE RELEASE SCENARIO

Mexichem Specialty Resin has one regulated flammable substance: Vinyl Chloride (VCM) CAS No. 75-01-4
The worse-case scenario assumes the failure of the largest storage tank. This tank has a capacity of 5,000 gallons; however, written operating procedures and high level alarms prevent more than 4,000 gallons from being present at one time. Failure of this tank would release 4,000 gallons (31,000 pounds) of Vinyl Chloride. It is assumed that the entire contents are released within ten minutes and find an ignition source. The result is a vapor cloud explosion. The distance from the source to its endpoint is 0.22 miles. For flammables, the endpoint is the level at which a fire or explosion could damage dwelllings or hurt people. Distance to the endpoint for Vinyl Chloride was found in Table 9 in the USEPA Offsite Consequence Analysis Guidance.
Mexichem Specialty Resin has one regulated toxic substance: Ammonia (anhydrous) CAS No. 7664-41-7
The worst case scenario assumes failure of the largest single heat exchanger. This heat exchanger has a capacity of 1,850 gallons; however, written operating procedures and high level alarms prevent more than 650 gallons from being present at one time. Failure of this heat exchanger would release 650 gallons (3,500 pounds) of ammonia. It is assumed that the entire contents are released within ten minutes. The distance from the source to its endpoint is 1.2 miles. For toxic materials, the endpoint is the chemical concentration in the air to which a person can be exposed for up to one hour without serious health effects. Distance to the endpoint for Ammonia (anhydrous) was found in USEPA's Guidance for Ammonia Refrigeration Exhibit 4-4 and Figure 4-2.

ALTERNATIVE RELEASE SCENARIO
Flammable Substance: Vinyl Chloride (VCM) CAS No. 75-01-4
The alternative release scenario is a gasket leak at a pipe or valve flange connection equivalent to a 1/4" hole. The leak is isolated within ten minutes. A leak rate of 80 pounds per minute would result in a release of 800 pounds over ten minutes. Unconfined vapor travels to the lower flammability limit (LFL). The distance to the endpoint for the LFL is less than 0.06 miles. Distance to lower flammability limit (LFL) for Vinyl Chloride was found in Table 20 in the USEPA Offsite Consequence Analysis Guidance.
Toxic Substance: Ammonia (anhydrous) CAS No. 7664-41-7

The alternative release scenario is a gasket leak at a pipe or valve flange connection or a corrosion hole in piping equivalent to a 1/4" leak. The leak is isolated within ten minutes. A leak rate of 100 pounds per minute would result in a release of 1,000 pounds over ten minutes. The distance to the endpoint is 0.2 miles. Distance to the endpoint for Ammonia (anhydrous) was found in USEPA's Guidance for Ammonia Refrigeration Exhibit 4-5 and Figure 4-3.

MITIGATION SYSTEMS

There are several tiers or layers of mitigation systems in place at Mexichem Specialty Resin. First and foremost is Mexichem Specialty Resin Policy and commitment to excellence in the areas of Safety, Health and Environmental Compliance. Mexichem Specialty Resin has built a strong reputation fulfilling this commitment at the Federal, State and local level and with its own employees and contractors. Second are the fourteen key elements of Mexichem Specialty Resin program. Adherence to these elements is further demonstration of PolyOne's commitment to excellence. Third are the specific mitigation measurements associated with regulated materials that Mexichem Specialty Resin has in place. These include dikes, curbs, impervious containment, detection systems, automatic controls, isolation valves, on site wastewater treatment and back-up systems. Fourth is the site comprehensive emergency response program discussed below. Finally, it is Mexichem Specialty Resin's commitment for continued improvement in all covered process areas.

PREVENTION PROGRAM

Mexichem Specialty Resin has in place an approved Risk Management Program for Ammonia encompassing prevention elements consistent with the New Jersey Toxic Catastrophe Prevention Act (TCPA) Title 13, 1B-3. Mexichem Specialty Resinalso has an approved plan under the New Jersey Spill Compensation and Control Act (DPCC) (N.J.S.A. 58:10-23.11) for both Ammonia and Vinyl Chloride. Additionally, Mexichem Specialty Resinhas a structured program under the Occupational Safety and Health Administration (OSHA) Process Safety Management Standard (PSM) for Highly Hazardous Chemicals (29 CFR 1910.119) for Vinyl Chloride. Vinyl Chloride is also regulated under the OSHA Vinyl Chloride Standard (29CFR 1910.1017) and the USEPA National Emission Standard for Hazardous Air Polutants (40 CFR Part 61 Subpart F 61.60). The same substances that are regulated under the United States Environmental Protection Agency 40 CFR Part 68 Accidental Release Prevention Requirements: Risk Management Programs (RMP) under the Clean Air Act Section 112(r)(7) are also regulated under one or more of these existing programs and their subsequent regulations.

Mexichem Specialty Resin has implemented the following prevention elements as part of these programs:

1. An Employee Participation policy to regularly consult with employees regarding the development and implementation of prevention program elements and hazard assessments.

2. A comprehensive Process Safety Information program which ensures complete and accurate written information concerning process chemicals, process technology and process equipment. This information is included in the employee training programs.

3. A Process Hazard Analysis is conducted to identify and analyze the potential hazards associated with the processing or handling of highly hazardous chemicals.

4. An Electrical Classification system to ensure properly designed electrical distribution systems in all chemical process areas.

5. The preparation of written Operating Procedures which describe tasks to be performed, operating conditions to be maintained, data to be recorded, and safety precautions to be taken to ensure safe operation of equipment.

6. Employee Training programs to ensure that all employees involved with chemicals, fully understand the requirements to safely operate each chemical process. Mexichem Specialty Resin has an "Operator Certification" program in place to train, test and certify all company employees who operate a chemical process.

7. A Contractor program to ensure that they have the appropriate job skills, knowledge and certifications to perform the job safely.

8. For new or modified processes, a Pre-Startup Safety review is conducted to ensure a safe transition into the normal operating mode.

9. A Mechancial Integrity / Preventive Maintenance program designed to continually review and ensure the integrity of all critical operating process equipment, process support utilities and instrumentation.

A¿ Identification and categorization of equipment and instrumentation
A¿ Inspections and tests
A¿ Establishment of prescribed inspection frequencies
A¿ Development and application of pertinent maintenance procedures
A¿ Training of maintenance personnel
A¿ Documentation of test and inspection results
A¿ Documentation of manufacturer's maintenance recommendations

10. A Hot Work Permit system to manage welding, cutting, brazing or spark producing operations in process areas.

11. A Management of Change system to manage changes involving processes, chemicals, technology, equipment or facilities.

12. An Incident Investigation of a chemical release or "near miss" is conducted by a team of experienced individuals familiar with the process. Recommendations are communicated and implemented as appropriate.

13. A facility Emergency Response program is in place in the event of a chemical release. This program is drilled internally and with the community emergency response personnel on a regular basis. An all hazards Emergency Response program is also in place for the surrounding community and the county. This program is coordinated through the Salem County Office of Emergency Services.

14. Annual Compliance Audits are performed to review all relevant documentation, verify process safety information, inspect the physical facilities and conduct interviews with representative plant personnel.

FIVE YEAR ACCIDENT HISTORY

During the past five years Mexichem Specialty Resin has had no chemical releases which created an emergency situation outside the plant boundaries nor resulted in any deaths, injuries, or significant property damage on site or offsite deaths, injuries, evacuations, sheltering in place, property damage or environmental damage.

EMERGENCY RESPONSE PROGRAM

Mexichem Specialty Resin has in place Emergency Procedures for handling accidental releases of chemicals. A notification system is in place to initiate response to any emergency. Key personnel are notified by a system of alarms, radios and pagers. Once this notification system is activated, a series of emergency plans is followed by key personnel who are always present on site. For example, in the event of a fire, the Emergency Response Team will respond and establish an incident command system sufficient to handle the emergency. The Emergency Response Team is trained to deal with fires, chemical releases, spills and other emergencies. The Emergency Response Team conducts regular training sessions and drills for team members. Some members are trained in First Aid/CPR. Coordinated drills with the Pedricktown and Auburn Fire Departments and the Salem County Office of Emergency Management are conducted annually to ensure good communication and operational effectiveness.

PLANNED CHANGES TO IMPROVE SAFETY

Mexichem Specialty Resin will continue to evaluate the regulated process areas under the New Jersey Toxic Catastrophe Prevention Act, the New Jersey Spill Compensation and Control Act, the Occupational Safety and Health Administration Process Safety Management Standard for Highly Hazardous Chemicals and the United States Environmental Protection Agency Accidental Release Prevention Requirements Risk Management Program to ensure safe operation of its facility.
Mexichem Specialty Resin is proactively involved in several risk reduction activities which include:
A¿ Technology Research
A¿ State of the Art Review
A¿ Best Management Practice

A¿ Inventory Reduction
A¿ Computerized Process Automation

Mexichem Specialty Resin will continue to work with the community emergency management coordinator, fire departments, community officials and County Office of Emergency Management to coordinate training, drills and information.